

EXHIBIT C

A written statement of Dr. Wood's opinions for this case is set forth below, and her curriculum vitae is attached. Dr. Wood's opinions are based upon her research and experience, which are described in the attached curriculum vitae.

Dr. Wood will provide important context and background about the American system of campaign finance, the features and operation of political spending, and the regulation of political spending.

- Dr. Wood will explain the various entities through which candidates receive financial support. Dr. Wood will explain that traditional entities include candidate campaign committees, party committees, and political action committees (PACs). These traditional entities can transfer funds to each other. These entities are typically regulated by the Federal Election Commission ("FEC"), or a state agency equivalent, which establishes/enforces reporting and disclosure requirements and contribution limitations. The rules generally require committees to report certain information about contributions and expenditures, such as source, amount, and date. The disclosure is conducted with periodic deadlines that increase in frequency as the election approaches. The reports are filed and housed with the campaign finance regulators, who release the data to the public. Members of the public can search the data to find information about contributions made to and expenditures made by the committees. In addition to disclosure requirements, these traditional entities generally are limited in the amount and type of contributions they can receive.
- Dr. Wood also will explain non-traditional entities that have emerged and engage in political spending such as Super PACs, 527 groups, and 501(c)(4) entities. Dr. Wood will generally describe these entities, and explain how these entities may receive unlimited contributions both in amount and type. Dr. Wood will explain generally the limitations on candidate involvement with these entities as compared to traditional campaign entities. The disclosure requirements associated with these non-traditional entities vary depending upon the type of entity. For example, 501(c)(4) entities generally are not required to publicly disclose contributors. These 501(c)(4) entities are often referred to as sources of "dark money" because of their lack of transparency to the public, compared to traditional entities such as a candidate's campaign committee. The lack of transparency is amplified when non-traditional entities are used in conjunction with one another. Some believe that the lack of transparency of these dark money entities make them ripe vehicles for ripe vehicles to use to circumvent limits set for the traditional entities. Moreover, because many of these non-traditional entities do not disclose the sources of their contributions, they prevent the public from detecting when public officials favor the preferences of their donors over the preferences of their broader constituency.
- Dr. Wood will educate the jury generally about the concept of campaign finance disclaimers, which are the "stand by your ad" requirements that appear with political messages. These disclaimers identify the entity that paid for the ad. Disclaimers have the feature of appearing immediately with the message, though in the video context,

they have the disadvantage of being displayed only very briefly. Dr. Wood will explain that disclaimers have consistently been shown to affect voter perceptions.

I approve the content contained within this disclosure.

Signed

A handwritten signature in black ink, appearing to be "Abigail", written over a horizontal line.

Dated August 29, 2022

Abby K. Wood

CONTACT

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Gould School of Law
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Los Angeles, CA 90089

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ACADEMIC APPOINTMENTS

USC Gould School of Law, Los Angeles, CA
Professor of Law, Political Science, and Public Policy, 2021 –
Associate Professor of Law, Political Science, and Public Policy, 2017 – 2021
Assistant Professor of Law, Political Science, and Public Policy, 2014 – 2017

University of Chicago School of Law, Chicago, IL
Class of 1949 Visiting Associate Professor of Law, Fall 2019

ADDITIONAL APPOINTMENTS

Commissioner, California Fair Political Practices Commission, 2021 –

Member, California Fair Political Practices Commission’s Task Force on Digital Advertising
Transparency, 2020 – 2021

Member, Federal Bipartisan Campaign Finance Task Force, 2015 – 2018

United States Court of Appeals for the Ninth Circuit, San Francisco, CA, *Law Clerk*,
Chambers of the Hon. John T. Noonan, Jr. 2012-2013

JOURNAL ARTICLES

[19] Aneja, Abhay, Jacob M. Grumbach, and Abby K. Wood. 2022. “Financial Inclusion in
Politics,” *New York University Law Review*

[18] Feinstein, Brian and Abby K. Wood, “Divided Agencies,” *Southern California Law
Review* (forthcoming, 2022).

[17] Abby K. Wood, Christopher Elmendorf, Douglas M. Spencer, and Nicolas Napolio. 2022.
“Mind the (Participation) Gap: Vouchers, Voting, and Visibility,” *American Politics Research*

[16] Abby K. Wood. 2022. “Voters Use Campaign Finance Transparency and Compliance
Information,” *Political Behavior*. <https://doi.org/10.1007/s11109-022-09776-4>

[15] Wood, Abby K. and Christian Grose. 2021. “Campaign Finance Transparency Affects
Legislators’ Election Outcomes and Behavior.” *American Journal of Political Science*.
<https://doi.org/10.1111/ajps.12676>

[14] Clouser McCann, Pamela, Douglas M. Spencer, and Abby K. Wood. 2021 “Measuring
State Capture,” *Wisconsin Law Review*.

[13] Abby K. Wood. 2021. “Learning from Campaign Finance Information.” *Emory Law
Journal* 70(5): 1091-1142.

[12] Abby K. Wood. 2020. “Facilitating Accountability for Online Political Advertisements.”
Ohio State Technology Law Journal 16(2): 520-557.

- [11] Grose, Christian & Abby K. Wood. 2019. "Randomized experiments by government institutions and American political development." *Public Choice* 185(3): 405-413, <https://doi.org/10.1007/s11127-019-00704-5>
- [10] Stein, Robert, et al., 2019. "Waiting to Vote in the 2016 Presidential Election: Evidence from a Multi-jurisdiction Study." *Political Research Quarterly*, <https://doi.org/10.1177/1065912919832374>
- [9] Elmendorf, Christopher S. & Abby K. Wood. 2018 "Elite Political Ignorance: Law, Data, and the Representation of (Mis)Perceived Electorates." *U.C. Davis Law Review* 52(2) (lead article).
- [8] Abby K. Wood & Ann M. Ravel. 2018. "Fool Me Once: Government Regulation of "Fake News" and other Online Political Advertising." *Southern California Law Review* 91(6): 1223-78.
- [7] Abby K. Wood. 2018. "Campaign Finance Disclosure". *Annual Review of Law & Social Science* 14(1). <https://www.annualreviews.org/doi/abs/10.1146/annurev-lawsocsci-110316-113428>
- [6] Mann, Christopher B., et al., 2018. "Pedagogical Value of Polling Place Observation By Students." *PS: Political Science & Politics*. <https://doi.org/10.1017/S1049096518000550>
- [5] Wood, Abby K. and David E. Lewis. 2017. "Agency Performance Challenges and Agency Politicization," *Journal of Public Administration, Research, and Theory* 27(4): 581-595. <https://doi.org/10.1093/jopart/mux014>
- [4] Michalski, Roger M. and Abby K. Wood. 2017. "Twombly and Iqbal at the State Level," *Journal of Empirical Legal Studies*, 14(2): 424-469. <https://doi.org/10.1111/jels.12152>
- [3] Wood, Abby K. and Douglas M. Spencer. 2016. "In the Shadows of Sunlight: The Effects of Transparency on State Political Campaigns," *Election Law Journal* 15(4): 302-329. <https://doi.org/10.1089/elj.2016.0365>
- [2] Jensenius, Francesca and Abby K. Wood. 2016. "Caught in the Act but not Punished: On Elite Rule of Law and Deterrence," *Penn State Journal of Law & International Affairs*. 686(4).
- [1] Spencer, Douglas M. and Abby K. Wood. 2014. "Citizens United, States Divided: An Empirical Analysis of Independent Political Spending," *Indiana Law Journal* 89(1):315-372.

BOOK
CHAPTERS

- [2] Stein, Robert, et al., "Polling Place Quality and Access" in *The Future of Election Administration* (Kathleen Hale and Bridgett A. King, eds., Palgrave, 2019).
- [1] "Charm and Punishment: How the Philippines' Leading Man Became Its Most Famous Prisoner." *Prosecuting Heads of State* (Ellen Lutz and Caitlin Reiger, eds., Cambridge University Press, 2009).

WORKING PAPERS	<p>“Decentralized Legislative Oversight of Bureaucratic Policy Making” (with Janna King Rezaee and Sean Gailmard) <i>Revise and resubmit at Journal of Theoretical Politics</i></p> <p>“Facebook Political Ads and Accountability: Outside Groups Are Most Negative, Especially When Hiding Donors or Disappearing” (with Shomik Jain)</p> <p>“The Political Economy of COVID-19 Policy Choices: Stay-at-Home Orders and Worker Political Efficacy in the States” (with Pamela Clouser McCann)</p> <p>“Outside Campaign Donations in Rural Congressional Districts” (with Zoe Nemerever)</p>
OTHER WRITING	<p>“Random Audits and Regulatory Compliance” in <i>Regulatory Review</i>, Nov 21, 2019, https://www.theregreview.org/2019/11/21/wood-grose-random-audits-regulatory-compliance/</p> <p>“The FEC’s Institutional Predicament” in <i>Administrative & Regulatory Law News</i>, fall 2019 (lead article)</p> <p>“Hillary Clinton, My Daughter, and Me” in <i>The Hillary Effect</i> (Jennifer Merolla and Rachel VanSickle-Ward, eds., 2020, Bloomsbury)</p> <p>“Campaign Finance Disclosure” in <i>Money in American Politics: An Encyclopedia</i> (David Schultz, ed., ABC-CLIO, 2018).</p>
AMICUS WRITING AND CONGRESSIONAL TESTIMONY	<p>Brief <i>Amici Curiae</i> from Legal Scholars of Campaign Finance in Support of Petitioners, <i>Representative Lieu, et. al., v. FEC</i>, No. 19-1398, July 22, 2020 (author, with nine law professors joining). The brief argued that <i>SpeechNow.org v. FEC</i>, which created so-called “Super PACs”, was wrongly decided.</p> <p>United States Senate Judiciary Committee, Subcommittee on Federal Courts, Oversight, Agency Action, and Federal Rights, regarding judicial ethics and dark money in judicial politics, June 13, 2022</p> <p>California Senate’s Standing Committee on the Judiciary, regarding SB 27, the Presidential Tax Transparency and Accountability Act, April 2019</p> <p>California Senate’s Standing Committee on Elections and Constitutional Amendments, regarding SB 149, the Presidential Tax Transparency and Accountability Act, April 2017</p>
OP-EDS	<p>“Citizens United turns 10 today. Here’s what we’ve learned about dark money”, Washington Post Monkey Cage, January 21, 2020. https://www.washingtonpost.com/politics/2020/01/21/citizens-united-turns-10-today-heres-what-weve-learned-about-dark-money/</p> <p>“Elizabeth Warren’s Pinky Promises with Little Girls”, NBC News THINK, Sept. 18, 2019, https://www.nbcnews.com/think/opinion/elizabeth-warren-s-selfie-my-daughter-went-viral-because-pinkie-ncna1055561</p> <p>“How will the Michael Cohen and Duncan Hunter scandals affect the November election? Here’s what our research finds” (with Christian R. Grose), Washington Post Monkey Cage, August 28, 2018, https://www.washingtonpost.com/news/monkey-cage/wp/2018/08/28/come-november-how-will-voters-react-to-the-cohen-and-hunter-revelations-heres-what-our-research-finds</p>

“Open up the black box of political advertising” (with Christopher S. Elmendorf and Ann Ravel), San Francisco Chronicle Op-Ed, Sept. 23, 2017,
<https://www.sfchronicle.com/opinion/openforum/article/Open-up-the-black-box-of-political-advertising-12221372.php>

“Disclosure can Encourage Political Speech” (with Michael Gilbert), The Hill, Oct. 21, 2016,
<https://thehill.com/blogs/pundits-blog/campaign/302152-disclosure-can-encourage-political-speech>

GRANTS & AWARDS

2017 New Initiatives Grant in Election Science – MIT Election Data and Science Lab and Madison Initiative of the William and Flora Hewlett Foundation (\$14,000)
 2016 CA FWD Research Grant (\$20,000)
 2014 Bedrosian Center Research Grant, USC (\$5,000)
 2011 Mike Synar Graduate Research Fellowship, Institute for Governmental Studies, U.C. Berkeley
 2010 U.C. Berkeley Empirical Legal Studies Fellowship
 2010 Dean’s Normative Time Fellowship, U.C. Berkeley
 2009 National Science Foundation, Empirical Implications of Theoretical Models Grant
 2008 National Science Foundation, IGERT Fellowship
 2004 Chayes International Public Service Fellowship, Harvard Law School
 2004 Fletcher School Merit Award
 2000 Thomas W. Knuckles Award for Ethics and Human Rights, Austin College
 2000 Austin College Leadership Fellowship

PRESENTATIONS (UPCOMING & PAST 3 YEARS)

TDB, Cornell Law School Faculty Workshop (invited), March 2023

“The Political Economy of COVID-19 Policy Choices: Stay-at-Home Orders and Worker Political Efficacy in the States” (with Pamela Clouser McCann), Conference on Empirical Legal Studies, University of Virginia, November 2022

“The Political Economy of COVID-19 Policy Choices: Stay-at-Home Orders and Worker Political Efficacy in the States” (with Pamela Clouser McCann), Political Institutions and Political Economy Symposium, University of Southern California, July 2022

“The Political Economy of COVID-19 Policy Choices: Stay-at-Home Orders and Worker Political Efficacy in the States” (with Pamela Clouser McCann), Law and Society Association Annual Meeting, Lisbon Portugal, July 2022

“Outside Campaign Donations in Rural Congressional Districts”, Visions in Methodology, November 2021

“Measuring State Capture”, University of Wisconsin School of Law (invited), June 2021

“Divided We Govern”, Gray Center Roundtable on Presidential Administration and Political Polarization, George Mason University (invited), June 2021

“Facebook Political Ads And Accountability”, Virtual Conference on Political Advertising, Wesleyan University (invited), May 2021

“The Political Economy of COVID-19 Policy Choices: Stay-at-Home Orders and Worker Political Efficacy in the States”, Midwest Political Science Assoc. Annual Meeting, April 2021

“Financial Inclusion in Politics”, University of Toronto School of Law, Law & Economics Workshop (invited), March 2021

“The Political Economy of COVID-19 Policy Choices: Stay-at-Home Orders and Worker Political Efficacy in the States”, University of Michigan Center for Political Studies Workshop (invited), April 2021

“The Political Economy of COVID-19 Policy Choices: Stay-at-Home Orders and Worker Political Efficacy in the States”, Durham University (invited), December 2020

“Campaign Finance Transparency Affects Legislative Candidate Performance at the Polls”, Wharton School of Business, University of Pennsylvania (invited), September 2020

Elections: What Could Go Wrong? And What Can Be Done About It?, Stanford Law School, May 2020 (invited but declined due to scheduling conflict)

“Learning from Campaign Finance Disclosures”, Emory University School of Law (invited), February 2020

“Transparency and Accountability for Online Political Ads”, Ohio State University School of Law (invited), January 2020

“Campaign Finance Transparency Affects Legislative Candidate Performance at the Polls”, Conference on Empirical Legal Studies, Pomona, CA, November 2019

“Campaign Finance Transparency Affects Legislative Candidate Performance at the Polls”, University of Chicago School of Law (invited), November 2019

“Campaign Finance Transparency Affects Legislative Candidate Performance at the Polls”, Northwestern University School of Law (invited), October 2019

“Campaign Finance Transparency Affects Legislative Candidate Performance at the Polls”, University of Wisconsin – Madison (invited), October 2019

“Campaign Finance Transparency Affects Legislative Candidate Performance at the Polls”, University of Iowa School of Law (invited), September 2019

“Lessons on Corruption from Judge Noonan”, Conference Honoring Judge Noonan’s Intellectual Legacy, U.C. Berkeley (invited), September 2019

“Campaign Finance Transparency Affects Legislative Candidate Performance at the Polls”, USC Political Institutions and Political Economy workshop, August 2019

“Show Me the Money: ‘Dark Money’ and the Informational Benefit of Campaign Finance Disclosure”, Midwest Political Science Association Annual Meeting, Chicago, April 2019

“Mind the (Participation) Gap: Vouchers, Voting, and Visibility”, Center for Law and Social Sciences Workshop (USC), February 2019

“Campaign Finance Transparency Affects Legislative Candidate Performance at the Polls”, University of California, San Diego, American Politics Speaker Series (invited), January 2019
“Mind the (Participation) Gap: Vouchers, Voting, and Visibility”, Southern Political Science Association Conference (Austin, TX) January 2019

“Campaign Finance Transparency Affects Legislative Candidate Performance at the Polls”, Conference on American Political Development and Causal Inference, USC (invited), January 2019

“Campaign Finance Transparency Affects Legislative Candidate Performance at the Polls”, University of Virginia Law and Economics Workshop (invited), November 2018

“Mind the (Participation) Gap: Vouchers, Voting, and Visibility”, Conference on Empirical Legal Studies (poster), November 2018

“Campaign Finance Transparency Affects Legislative Candidate Performance at the Polls”, Emory University Political Institutions and Methodology Colloquium (invited), September 2018

“Campaign Finance Transparency Affects Legislative Candidate Performance at the Polls”, USC Gould School of Law faculty workshop, September 2018

“Reforming the Campaign Finance System”, Harvard Kennedy School’s conference on Inequality, Democracy, and America’s Future (invited), August 2018

“Mind the (Participation) Gap: Vouchers, Voting, and Visibility”, American Law and Economics Association annual meeting, Boston, MA, May 2018

“Mind the (Participation) Gap: Vouchers, Voting, and Visibility”, Midwest Political Science Association annual meeting, Chicago, IL, April 2018

“Show Me the Money: ‘Dark Money’ and the Informational Benefit of Campaign Finance Disclosure”, American Association of Law Schools annual meeting, San Diego, Jan. 2018

DOCTORAL
DISSERTATION
COMMITTEES

USC Political Science and International Relations: David Ebner (U. Delaware),
Thora Giallouri (Fort Lewis College), Kelebogile Zvobgo (William & Mary),
Taylor Dalton (Santa Clara Law), Samuel Bonilla, Jose Alcocer

TEACHING

University of Southern California Gould School of Law
Administrative Law and Regulatory Policy (2014-)
Analytical Methods for Lawyers (2015 -)
Money In Politics (2016 -)

University of Chicago School of Law
Administrative Law and Regulatory Policy (fall term, 2019)

University of California, Berkeley (graduate student instructor)
Supreme Court and Public Policy (2012)
Introduction to Empirical Analysis and Quantitative Methods (2010 - 2011)
Comparative Politics (2010)

Tufts University, Fletcher School of Law and Diplomacy
International Human Rights Law (2008)
International Legal Research and Writing (2007 - 2009)

Tufts University
International Law (2007 coordinating instructor, 2006 teaching assistant)

OTHER
PROFESSIONAL
SERVICE

USC Gould Committee Service: Committee on Undergraduate Programs (2022 -), Administration and Finance Committee (2021-2022), Admissions Committee (2020 - 2021), Clerkship Committee (2014 - 2020, co-chair 2016-2018), Ad Hoc Committee on Sexual Harassment (2018)

Referee: Cambridge University Press, National Science Foundation, *American Political Science Review*, *American Journal of Political Science*, *Journal of Politics*, *Journal of Law, Economics, and Organizations*, *Journal of Empirical Legal Studies*, *Political Behavior*, *Election Law Journal*, *Law and Society Review*, *British Journal of Political Science*, *Political Science Quarterly*, *American Politics Research*, *Politics & Gender*, *Congress and the Presidency*, *Research & Politics*, *Journal of Urban Affairs*, *Journal of Public Affairs*

Co-Organizer: Political Economy and Public Law (PEPL X) (June 2017); Southern California Law and Social Science Forum (March 2015) Workshop on Experimental Methods at USC (December 2014).

Discussant: Conference on Empirical Legal Studies (2014, 2019), Southern Political Science Association (2015, 2019), Annual Meeting, Midwest Political Science Association (2015, 2019, 2021), USC Political Institutions and Political Economy (2018), USC Symposium on Election Administration and Technology (2020)

Program Committees: Conference on Empirical Legal Studies (2019)

Other service: Board of Directors, National Institute for Money in Politics (2018 - 2021), Board of Directors, OpenSecrets (2021-)

EDUCATION

University of California, Berkeley, Berkeley, CA
Ph.D., Political Science;
Thesis title: Exposing Malfeasance: Anti-Corruption Laws in the Fifty States

Harvard Law School, Cambridge, MA
J.D.; Senior Editor, *International Law Journal*

Tufts University, Fletcher School of Law and Diplomacy, Medford, MA
M.A.L.D.

Austin College, Sherman, TX
B.A., Spanish, *Summa cum laude*

OTHER LEGAL
EMPLOYMENT

Step toe & Johnson LLP, Washington, D.C., *Summer Associate*

National Democratic Institute for International Affairs, Washington, D.C., *Researcher*

World Bank, Poverty Reduction and Economic Management Network for Latin America and Caribbean region (LAC-PREM), Washington, D.C., *Consultant*

United States Agency for International Development, Cairo, Egypt, *Legal Intern*

Baker Botts LLP, Dallas, TX, *Legal Assistant Clerk*

BAR ADMISSION

New York, 2008